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BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

DEPARTMENT OF TRANSPORTATION
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DOCKET SECTION

DST-95-206-13

U.S.-TORONTO SERVICE PROCEEDING

Docket 50168

ANSWER OF USAIR, INC.
TO MOTION TO COMPEL OF
TRANS WORLD AIRLINES, INC.

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March 21, 1995

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TRANS WORLD AIRLINES, INC.**

USAir, Inc. hereby answers in opposition to the motion of Trans World Airlines, Inc. to compel USAir and the other applicants in this proceeding to construct estimates of "self-diversion" of U.S.-Toronto traffic and produce additional direct exhibits which TWA alleges were required by the Department's Evidence Request attached to the Instituting Order 95-2-57 (February 28, 1995).

TWA's attempt to base its demand for self-diversion analyses on DOT's Evidence Request is clearly frivolous. TWA claims that the word "net" in the Department's direction to show "the net revenue from the proposed service" implies a reduction for revenue derived from passengers on the proposed service who might otherwise use the applicant's existing services to\from Toronto. Only TWA so misreads the Evidence Request.

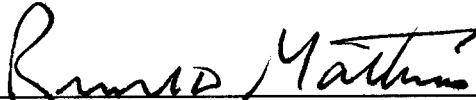
The term "net revenue" refers to revenue after fare dilution. This is its standard meaning, both in the Evidence Request and in industry usage. Reflecting this

meaning, the same subsection (e) of the Evidence Request goes on to further require that applicants "[e]xplain the derivation of all dilution factors used in each revenue estimate."

Since the Department in recent years has neither required production of "self-diversion" estimates nor accorded them significance in its decisions, TWA's motion appears designed simply to highlight an argument which it should have reserved for its brief. TWA's motion should be summarily denied.

Respectfully submitted,

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Certificate of Service

I certify that I served the Answer of USAir, Inc. to Motion to Compel of Trans

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March 21, 1995